

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE**  
**EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE**

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**IN RE:**

**David Ross Ward**

**Case No. 22-31940-SHB**

**Debtors.**

**Chapter 7**

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**MOTION TO CONVERT CASE FROM CHAPTER 7 TO CHAPTER 13**

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**NOTICE OF OPPORTUNITY TO OBJECT AND FOR HEARING**

**Notice is hereby given that:**

Pursuant to E.D. Tenn. LBR 9013-1(h), the court may consider this matter without further notice or hearing unless a party in interest files an objection. If you object to the relief requested in this paper, you must file with the clerk of court at Howard H. Baker, Jr. U.S. Courthouse, 800 Market Street, Suite 330, Knoxville, Tennessee 37902, an objection within **21 days** from the date this paper was filed and serve a copy on the movant's attorney, William E. Maddox, Jr, William E. Maddox, Jr., LLC, PO Box 31287, Knoxville, TN 37930, or [wem@billmaddoxlaw.com](mailto:wem@billmaddoxlaw.com). If you file and serve an objection within the time permitted, the court will schedule a hearing and you will be notified. If you do not file an objection within the time permitted, the court will consider that you do not oppose the granting of the relief requested in this paper and may grant the relief requested without further notice or hearing. Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

Pursuant to 11 U.S.C. § 1307, **David Ross Ward**, Debtors, by and through counsel hereby requests that this court enter an Order converting this case under Chapter 7 to a case under Chapter 13 of the Bankruptcy code (Title 11 of the United States Code), on the grounds set forth below;

1. On December 20, 2022, the debtor/debtors filed a Voluntary Petition under Chapter 7 of the Bankruptcy Code, case# 22-31940.

2. This case has not been previously converted under 11 U.S.C. § 1112, or § 1208, or § 1307.

**WHEREFORE**, the Debtor/Debtors pray for an order converting this case under Chapter 7 to Chapter 13 of the Bankruptcy Code.

Respectfully submitted March 28, 2023.

s/ William E. Maddox, Jr.  
William E. Maddox, Jr. BPR#017462  
William E. Maddox, Jr. LLC  
Attorney at Law  
P.O. Box 31287  
Knoxville, TN 37930  
Phone: (865) 293-4953

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and exact copy of the foregoing Motion to Convert Case from Chapter 7 to Chapter 13, and Proposed Order, has been forwarded by facsimile, email, or Electronic Case Filing (ECF) to the following:

Office of the U.S. Trustee  
Attn: Tiffany Dilorio  
800 Market Street, Suite 114  
Howard J. Baker Jr. U.S. Courthouse  
Knoxville, TN 37902

John P. Newton ECF  
1111 Northshore Drive, Suite S-570  
Knoxville, TN 37919

\*\*\*\*\* ALL CREDITORS ON ATTACHED MATRIX SERVED VIA US MAIL \*\*\*\*\*

Dated: March 28, 2023

s/ William E. Maddox, Jr. #017462  
William E. Maddox, Jr.